

**UNITED STATES OF AMERICA
FEDERAL ENERGY REGULATORY COMMISSION**

[Docket No. IC25-3-000]

**COMMISSION INFORMATION COLLECTION ACTIVITIES (FERC-725);
COMMENT REQUEST; EXTENSION**

(December 31, 2024)

AGENCY: Federal Energy Regulatory Commission.

ACTION: Notice of information collection and request for comments.

SUMMARY: In compliance with the requirements of the Paperwork Reduction Act of 1995, the Federal Energy Regulatory Commission (Commission or FERC) is soliciting public comment on the currently approved information collection, FERC 725, Certification of Electric Reliability Organization; Procedures for Electric Reliability Standards. There were no changes made to the reporting requirements for this information collection.

DATES: Comments on the collection of information are due **[INSERT DATE 60 DAYS AFTER DATE OF PUBLICATION IN THE FEDERAL REGISTER]**.

ADDRESSES: You may submit copies of your comments (identified by Docket No. IC25-3-000) by one of the following methods:

Electronic filing through <https://www.ferc.gov>, is preferred.

- Electronic Filing: Documents must be filed in acceptable native applications and print-to-PDF, not in scanned or picture format.
- For those unable to file electronically, comments may be filed by USPS mail or by other delivery methods:

- o Mail via U.S. Postal Service Only: Federal Energy Regulatory Commission, Secretary of the Commission, 888 First Street, N.E., Washington, DC 20426.
- o All other delivery services: Federal Energy Regulatory Commission, Office of the Secretary, 12225 Wilkins Avenue, Rockville, MD 20852.

Instructions: All submissions must be formatted and filed in accordance with submission guidelines at: <https://www.ferc.gov>. For user assistance, contact FERC Online Support by e-mail at ferconlinesupport@ferc.gov, or by phone at (866) 208-3676 (toll-free).

Docket: Users interested in receiving automatic notification of activity in this docket or in viewing/downloading comments and issuances in this docket may do so at

<https://www.ferc.gov>.

FOR FURTHER INFORMATION: Kayla Williams may be reached by e-mail at DataClearance@FERC.gov, telephone at (202) 502-6468.

SUPPLEMENTARY INFORMATION:

Title: FERC-725, Certification of Electric Reliability Organization; Procedures for Electric Reliability Standards.

OMB Control No.: 1902-0225

Type of Request: Three-year extension of the FERC-725 information collection requirements with no changes to the current reporting and recordkeeping requirements.

Abstract: The FERC-725 contains the following information collection elements:

Self-Assessment and ERO (Electric Reliability Organization) Application: The Commission requires the ERO to submit to FERC a performance assessment report every

five years. The next assessment is due in 2025. Each Regional Entity submits a performance assessment report to the ERO.

Submitting an application to become the ERO is also part of this collection.¹

Reliability Assessments: 18 CFR 39.11 requires the ERO to assess the reliability and adequacy of the Bulk-Power System in North America. Subsequently, the ERO must report to the Commission on its findings. Regional entities perform similar assessments within individual regions. Currently the ERO submits to FERC three assessments each year: long term, winter, and summer. In addition, the North American Electric Reliability Corporation (NERC, the Commission-approved ERO) also submits various other assessments as needed.

Reliability Standards Development: Under section 215 of the Federal Power Act (FPA),² the ERO is charged with developing Reliability Standards. Regional Entities may also develop regional specific standards and have standard experts on staff to work with entities below the regional level.

Reliability Compliance: Reliability Standards are mandatory and enforceable upon approval by the Commission. In addition to the specific information collection requirements contained in each standard (cleared under other information collections), there are general compliance, monitoring and enforcement information collection

¹ The Commission does not expect any new ERO applications to be submitted in the next five years and is not including any burden for this requirement in the burden estimate. FERC still seeks to renew the regulations pertaining to a new ERO application under this renewal but is expecting the burden to be zero for the foreseeable future. 18 CFR 39.3 contains the regulation pertaining to ERO applications.

² 16 U.S.C. 824o

requirements imposed on applicable entities. Audits, spot checks, self-certifications, exception data submittals, violation reporting, and mitigation plan confirmation are included in this area.

Stakeholder Survey: The ERO uses a stakeholder survey to solicit feedback from registered entities³ in preparation for its **five-year** self-performance assessment. The Commission assumes that the ERO will perform another survey prior to the 2025 self-assessment.

Other Reporting: This category refers to all other reporting requirements imposed on the ERO or regional entities in order to comply with the Commission's regulations. For example, FERC may require NERC to submit a special reliability assessment or inquiry. This category captures these types of one-time filings required of NERC or the Regions. The Commission implements its responsibilities through 18 CFR Part 39.

Type of Respondent: Electric Reliability Organization, Regional entities, and registered entities.

*Estimate of Annual Burden*⁴: The Commission estimates the total annual burden and cost⁵ for this information collection in the table below. For hourly cost (for wages and

³ A "registered entity" is an entity that is registered with the ERO. All Bulk-Power System owners, operators and users are required to register with the ERO. Registration is the basis for determining the Reliability Standards with which an entity must comply. See <http://www.nerc.com/page.php?cid=3%7C25> for more details.

⁴ "Burden" is the total time, effort, or financial resources expended by persons to generate, maintain, retain, or disclose or provide information to or for a federal agency. For further explanation of what is included in the information collection burden, refer to Title 5 Code of Federal Regulations 1320.3.

⁵ Costs (for wages and benefits) are based on wage figures from the Bureau of Labor Statistics (BLS) for May 2024 (at https://www.bls.gov/oes/current/naics2_22.htm) and benefits information (at <https://www.bls.gov/news.release/ecec.nr0.htm>) :

benefits), we estimate that 70% of the time is spent by Electrical Engineers (code 17-2071, at \$79.31/hr.), 10% of the time is spent by Legal (code 23-0000, at \$162.66/hr.), and 20% by Information and Record Clerk (code 43-4199, at \$44.74/hr.). Therefore, we use the weighted hourly cost (for wages and benefits) of \$80.73(rounded) {or [(0.70) * (\$79.13/hr.)] + [(0.10) * \$162.66/hr.] + [(0.20) * \$44.74/hr.]}

FERC-725, Certification of Electric Reliability Organization; Procedures for Electric Reliability Standards						
Type of Respondent	Type of Reporting Requirement	No. of Respondents (A)⁶	Annual No. of Responses Per Respondent (B)⁷	Total No. of Responses (A)x(B)=(C)	Average Burden Hours & Cost (\$) per Response (rounded) (D)	Estimated Total Annual Burden Hrs. & Cost (\$) (rounded) (C)x(D)
Electric Reliability Organization (ERO)	Self-Assessment	1	.2	.2	4,160hrs.; \$335,837	832 hrs.; \$67,167
	Reliability Assessments		4	4	10,400 hrs.; \$839,592	41,600 hrs.; \$3,358,368
	Reliability Compliance		2	2	18,720 hrs.; \$1,511,266	37,440 hrs.; \$3,022,531
	Standards Development		1	1	24,960 hrs.; \$2,015,021	24,960 hrs.; \$2,015,021
	Other Reporting		1	1	4,160 hrs.; \$335,836	4,160 hrs.; \$335,836
<i>ERO, Sub-Total</i>						<i>108,992 hrs.; \$8,798,924</i>
Regional Entities	Self-Assessment	6	.2	1.2	4,160 hrs.; \$335,836	4,992 hrs.; \$403,004
	Reliability Assessments		1	6	12,480 hrs.; \$1,007,510	74,880 hrs.; \$6,045,062

⁶ Estimated number of respondents is taken from the November 20, 2024, NERC Compliance Registration tables. NERC is the only ERO and there are six regional entities (MRO, WECC, RF, SERC, NPCC and Texas RE). The estimated 3,735 represents the number of only US unique entities.

⁷ In instances where the number of responses per respondent is “1,” the Commission Staff thinks that the actual number of responses varies and cannot be estimated accurately.

	Reliability Compliance		1	6	47,840 hrs.; \$3,862,123	287,040 hrs.; \$23,172,739
	Standards Development		1	6	1,560 hrs.; \$125,938	9,360 hrs.; \$755,632
	Other Reporting		1	6	1,040 hrs.; \$83,959	6,240 hrs.; \$503,755
<i>Regional Entities, Sub-Total</i>						382,512 hrs.; \$30,880,194
Registered Entities	Stakeholder Survey		.2	747	8 hrs.; \$646	5,976 hrs.; \$482,442
	Reliability Compliance	3,735	1	3,735	180 hrs.; \$14,531	672,300 hrs.; \$54,274,779
<i>Registered Entities, Sub-Total</i>						678,276 hrs.; \$54,757,221
Total Burden Hrs. and Cost						1,169,870 hrs.; \$94,436,339

Comments: Comments are invited on: (1) whether the collection of information is necessary for the proper performance of the functions of the Commission, including whether the information will have practical utility; (2) the accuracy of the agency’s estimate of the burden and cost of the collection of information, including the validity of the methodology and assumptions used; (3) ways to enhance the quality, utility and clarity of the information collection; and (4) ways to minimize the burden of the collection of information on those who are to respond, including the use of automated collection techniques or other forms of information technology.

Debbie-Anne A. Reese,
Secretary.